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VIA ECF

April 4, 2025

Hon. Robert W. Lehrburger
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

SO ORDERED:

04/07/2025

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

Re: *Handberry v. Thompson*, 96-cv-6161 (GBD)(RWL)

Dear Judge Lehrburger:

We write on behalf of Plaintiffs in the above-referenced matter to request an order under Your Honor's Individual Rule III.G authorizing the sealed filing of Plaintiffs' reply to Defendants' March 31, 2025 Letter, ECF No. 393.

Plaintiffs have no confidentiality interest in the information contained within the reply. Defendants, however, have expressed concerns regarding the disclosure of ostensibly "confidential" information in certain of Plaintiffs' recent filings. *See, e.g.*, Letter from B. Anderson, dated Mar. 20, 2025, ECF No. 391 at 1, 4. Defendants' concerns have not yet been addressed by the Court or otherwise resolved. Plaintiffs therefore seek to provisionally file the entirety of their reply under seal so that Defendants may have an opportunity to seek continued protection of any material they believe may be confidential. Defendants have agreed to this process.

At this time, Plaintiffs take no position as to any such request that Defendants may file. The parties have agreed to work together to submit an unsealed version of Plaintiffs' reply by April 10, 2025.

Respectfully submitted,

THE LEGAL AID SOCIETY
PRISONERS' RIGHTS PROJECT

/s/ Lauren Stephens-Davidowitz

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